

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Etta Calhoun, Sherry Porter, and  
Cynthia Gray, on behalf of themselves and on  
behalf of all others similarly situated,

Plaintiffs,

v.

Invention Submission Corporation d/b/a  
InventHelp, Technosystems Consolidated  
Corp., Technosystems Service Corp., Western  
Invention Submission Corp., Universal  
Payment Corporation, Intromark  
Incorporated, Robert J. Susa, Thomas Frost,  
P.A., Thomas Frost, John Doe Companies 1-  
10, John Doe Individuals 1-10,  
Defendants.

No. 2:18-cv-01022

Judge Cathy Bissoon

Magistrate Judge Patricia L. Dodge

Carla Austin and Nil Leone, individually  
and on behalf of all other persons similarly  
situated,

Plaintiffs,

v.

Invention Submission Corporation d/b/a  
InventHelp, Western Invention Submission  
d/b/a Western InventHelp,

Defendants.

No. 2:19-cv-01396

Judge Cathy Bissoon

Magistrate Judge Patricia L. Dodge

<p>Geta Miclaus, and Vim and Kevin Byrne, on behalf of themselves and all other persons similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>Invention Submission Corporation d/b/a InventHelp, Technosystems Consolidated Corp., Technosystems Service Corp., Western Invention Submission Corp. d/b/a Western InventHelp, Universal Payment Corporation, Intromark Incorporated, Robert J. Susa, Thomas Frost, P.A., Thomas Frost, John Doe Companies 1-10, John Doe Individuals 1-10,</p> <p style="text-align: center;">Defendants.</p>	<p>No. 2:20-cv-681</p> <p>Judge Cathy Bissoon</p> <p>Magistrate Judge Patricia L. Dodge</p>
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### **MOTION TO CONSOLIDATE AND APPOINT INTERIM LEAD CLASS COUNSEL**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Plaintiffs Etta Calhoun, Sherry Porter, Cynthia Gray, Geta Miclaus, and Vim and Kevin Byrne, by and through their undersigned counsel, and for the reasons more fully set forth in the accompanying (i) Memorandum of Law and (ii) Declaration of Julie Pechersky Plitt and the exhibits attached thereto, hereby move for an Order pursuant to Rules 42 and 23(g) of the Federal Rules of Civil Procedure: (a) consolidating the above-captioned actions; (b) appointing Oxman Law Group as Interim Lead counsel for the consolidated actions; and (c) providing such other and further relief that the Court may deem just and proper.

Dated: Briarcliff Manor, New York  
July 13, 2020

Respectfully submitted,

By:           /s/ Julie Pechersky Plitt            
JULIE PECHERSKY PLITT  
**OXMAN LAW GROUP, PLLC**  
120 Bloomingdale Road, Suite 100  
White Plains, NY 10605  
Tel: (914) 368-9070  
jplitt@oxmanlaw.com

*Counsel for the Calhoun and Miclaus  
Plaintiffs*